

Richard C. Goertemiller

July 17, 2006

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: Business Opportunity Rule, R511993

Dear Sir or Madam:

I am writing to express the strongest possible opposition to the proposed Business Opportunity Rule R511993. If this rule is adopted, it will destroy the business that my wife and I as Shaklee Independent Distributors have worked to build for over 30 years. This rule will take away our livelihood.

While I understand your obligation to protect against "unfair and deceptive acts or practices," the rule as proposed would impose confusing and extraordinarily burdensome paperwork on us as a small business owner. I have neither the time to acquire all these various papers nor the space to store their copies for the time period required. I am not unique in this. My time is spent helping my prospects understand how they can improve the health of their families and earn whatever income they desire. This is much more beneficial to society than is accumulating paperwork.

For example, the proposed disclosure statement, while I am sure it is well intended, would be nearly impossible to prepare, having to be different for each person we approach about the opportunity. This, along with the inconvenience, delay, and air of suspicion the seven-day waiting period creates, would discourage even the most enthusiastic prospect and most likely end any possibility of any future business relationship. Our sign-up rates would plummet to zero, damaging not only our own business but also eliminating all future benefits to the prospect – benefits for improved health, both physically and financially, and the opportunity to create financial independence.

I suggest the rules you propose should not apply to business opportunities that cost less than a common household appliance, as is true of the Shaklee opportunity. I understand the previous limit was \$500 and you propose making it \$0. I strongly urge you to raise that limit to \$1000.

The requirement to furnish 10 references who live closest to the prospect and who signed up within the past three years is filled with difficulties. Identity theft is a huge problem today. Few would be willing to allow their contact information to be disclosed to other buyers. Providing such information to a prospect from a competing company would be too risky lest they then attempt to solicit those names for the competition. Surely you wouldn't require us to give our private information to our competitors!

The proposal to release information regarding lawsuits don't distinguish between whether the company was found innocent or not liable. This makes no sense to me. Long-time companies such as Shaklee (now 50 years old) would be at a definite disadvantage to the start-up companies, who are much more likely to have legal issues.

It is clear that these requirements, if enacted, would place a serious and undue burden upon Shaklee Distributors, and would unnecessarily complicate the process of sponsoring. I believe this Rule, if enacted, would have an extremely negative impact on our business as well as on all direct selling businesses. Therefore, I request that you withdraw consideration of this Rule.

Thank you for considering my comments.

Sincerely,

Richard C. Goertemiller